

CONDON & ASSOCIATES, PLLC

ATTORNEYS AT LAW
55 Old Turnpike Road, Suite 502
Nanuet, New York 10954
Telephone: (845) 627-8500
Facsimile: (845) 627-8507
www.condonlawoffices.com

Brian K. Condon [†]
Laura M. Catina [†]
Amy M. Witkowski [†]
Dawn Congiusti, Paralegal

[†]Admitted in New York and New Jersey

Email Address: brian@condonlawoffices.com

July 16, 2014

Via CM/ECF

Hon. Vincent L. Briccetti, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street, Room 630
White Plains, New York 10601

Re: Michael Goldstein, et al. vs. Solucorp Indus. Ltd., et al.
United States District Court, S.D.N.Y. - Docket No. 11-CIV-6227

Dear Honorable Sir:

As this Honorable Court is aware, our firm represents Solucorp Industries, Peter Mantia, Joseph Kemprowski (now deceased) and London Ventures in the above referenced matter

While named a "consultant", Mr. Kemprowski was the only individual I dealt with regarding the Solucorp and London Ventures companies. Since his passing, I have been advised that his widow, Arle Piero, and John Van Duzen are the only remaining Board Members of Solucorp. However, upon speaking to Ms. Piero she knows nothing about Solucorp or London Ventures. Solucorp has no offices, telephone number, employees, bank accounts, etc. I do not have a way to reach Mr. Van Duzen as I have no telephone number or address for him. I do not know how I can represent a company when I have

The primary Plaintiff, Mr. Goldstein, is being deposed tomorrow. For the better part of a week, I have been trying to gather information so that I may depose him. However, without a client, I am not able to do so. I have no one to talk to, I have no documents to review with my client. I feel that my proceeding tomorrow with no authority or client would be professionally improper.

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Therefore, based on the foregoing taken together with Mr. Kemprowksi's death, I would ask permission to make a motion to be relieved as counsel for Solucorp Industries, Joseph Kemprowski (now deceased) and London Ventures. I would ask that the deposition of the Plaintiff, Mr. Michael Goldstein, be stayed until my application can be heard.

Your Honor, I have been practicing law for 18 years and I have never been faced with this situation before. I apologize for asking for the Court's assistance, however, I do not know where else to turn.

I thank the Court for its time and consideration.

Very truly yours,

CONDON & ASSOCIATES, PLLC

By: 
Brian K. Condon

BKC/dc

cc: Robert L. Lash, Esq.
Evan Newman, Esq.
Joseph Cannella, Esq.